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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:
All Actions

Master Docket No. 11-CV-2509-LHK

**STIPULATION AND [PROPOSED]
ORDER REGARDING AMENDING
ANSWERS AND AFFIRMATIVE
DEFENSES**

This Stipulation and Proposed Order is entered into by and among the parties to the above captioned actions.

WHEREAS, on May 21, 2012, Defendants filed answers to the Consolidated Amended Complaint (Dkt Nos. 126, 127, 128, 129, 130, 131 & 132); and

WHEREAS, on June 7, 2012, Plaintiffs wrote to Defendants claiming various deficiencies with respect to Defendants' affirmative defenses:

The parties agree as follows and request that the Court enter an Order approving this Stipulation.

1 1. Defendants in the above-captioned cases shall have 21 days from the date of this
2 Stipulation to file amended answers and affirmative defenses. Defendants' amended answers and
3 affirmative defenses shall not include any new affirmative defenses. Without conceding that
4 Plaintiffs' arguments have merit, Defendants agree to consider Plaintiffs' arguments in an effort
5 to avoid motions practice.

6 2. Plaintiffs in the above-captioned cases shall have 21 days from the filing of each
7 Defendant's amended answer and affirmative defenses to seek relief pursuant to Rule 12(f).

8 3. Plaintiffs acknowledge that this Stipulation shall not foreclose Defendants from
9 seeking leave to amend or add affirmative defenses or specific denials after Defendants have filed
10 their amended answers and affirmative defenses.

11 Dated: June 14, 2012

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